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18 Attorney for Plaintiff
19 CAROL ENGLE and DAVE JOHNSON

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 OAKLAND DIVISION

23 CAROL ENGLE and DAVE JOHNSON, on
24 behalf of themselves and all others similarly
situated,

25 Plaintiff,

26 vs.

27 SANOFI-AVENTIS U.S. INC., a Corporation,
and DOES 1-10,

28 Defendants.

Case No. 4:10-CV-04141-SBA

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE INITIAL
CASE MANAGEMENT DEADLINES**

1 Defendant sanofi-aventis U.S., LLC (“Defendant”) and Plaintiffs Carol Engle and Dave
 2 Johnson (“Plaintiffs”), by and through their respective counsel, file this Stipulation and
 3 [Proposed] Order to Extend the Initial Case Management Deadlines (“Stipulation”) pursuant to
 4 Local Rule 6-2:

5 1. WHEREAS, on September 15, 2010, Plaintiffs filed the instant action against
 6 Defendant in the United States District Court for the Northern District of California, Case No.
 7 4:10-CV-04141-SBA, entitled *Carol Engle and Dave Johnson v. Sanofi-Aventis U.S., Inc.*;

8 2. WHEREAS, following the filing of the Complaint, the Court issued an Order
 9 Setting Initial Case Management Conference and ADR Deadlines (“Order”) setting the Case
 10 Management Conference for December 22, 2010;

11 3. WHEREAS, the Court’s Order further set additional case-related deadlines for
 12 meeting and conferring regarding the case, filing the ADR certification, the Rule 26 Report, and
 13 the Case Management Conference Statement, and completing initial disclosures;

14 4. WHEREAS, on December 7, 2010, the parties stipulated to extend Defendant’s
 15 time to respond to the Complaint until January 8, 2010;

16 5. WHEREAS, the Parties have engaged in discussions regarding the potential for
 17 consolidation of this matter with the related matter entitled *Alan Saldana v. Sanofi-Aventis U.S*
 18 *Inc.* (Case No. 4:10-cv-04672-SBA) and the potential stay of this matter pending decisions from
 19 the 9th Circuit in cases involving issues similar to those presented in this matter;

20 6. WHEREAS, the Parties still need to meet and confer about case-related issues,
 21 including but not limited to, the discovery plan, their Joint Case Management Statement and the
 22 deadlines in the case;

23 7. WHEREAS, on December 6, 2010, this Court issued an Order reassigning this
 24 matter to the Honorable Sandra Brown Armstrong and continuing the Initial Case Management
 25 Conference until March 30, 2011;

26 8. WHEREAS, pursuant to this Court’s December 6, 2010 Order, the current
 27 deadline for the parties to file their Joint Case Management Statements and Rule 26(f) reports,
 28 and to serve their Initial Disclosures remains December 15, 2010;

1 9. WHEREAS, good cause exists for a continuance of the deadlines for the parties to
2 file their Joint Case management Conference Statement and Rule 26(f) Report, and to serve their
3 Initial Disclosures for approximately 30 days, until January 14, 2011;

4 10. WHEREAS, neither party will be prejudiced as a result of extending the above-
5 referenced deadlines;

6 For the foregoing reasons, GOOD CAUSE exists to extend the parties' deadline to file
7 their Joint Case Management Conference Statement and Rule 26(f) Report, and to serve their
8 Initial Disclosures for approximately 30 days, until January 14, 2011.

9
10 Dated: December 8, 2010

MORGAN, LEWIS & BOCKIUS LLP

11
12 By /s/ Jennifer A. Lockhart

13 Richard G. Rosenblatt (*Admitted Pro Hac Vice*)
14 Christopher D. Havener (*Admitted Pro Hac Vice*)
Jennifer A. Lockhart
Attorneys for Defendant
SANOFI-AVENTIS U.S., LLC

15 Dated: December 8, 2010

HOYER & ASSOCIATES

16
17 By /s/ Richard A. Hoyer

18 Richard A. Hoyer
19 Attorney for Plaintiff
CAROL ENGLE and DAVE JOHNSON

20
21 **ORDER**

22 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

23
24
25 Dated: _12/13/10

26 By: 
United States District Court Judge